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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

TOMAS DUEÑO ESPADA  
MERCEDES LUGO RODRIGUEZ

DEBTOR

CASE NO.: 16-00470-ESL

CHAPTER 13

**MOTION AMENDING SCHEDULE G**

**TO THE HONORABLE COURT:**

**COME NOW** debtors through the undersigned attorney and very respectfully state and pray as follows:

- 1) Schedule G needs to be amended to correct executor contracts.
- 2) Schedule G is hereby amended and filed.

**WHEREFORE** debtor respectfully prays from this Honorable Court to allow the amended Schedule B in substitution of the one previously filed.

**NOTICE TO CREDITORS AND PARTIES IN INTEREST**

Notice is hereby given that a Motion Amending Schedule G has been filed by Debtor.

Within FOURTEEN (14) DAYS AFTER SERVICE as evidenced by the certification, and an additional three (3) days pursuant Fed. R. Bank P. (9006) (f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief or remedy sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the objection will be deemed unopposed and may be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the Court, the interest of justice requires otherwise. If you file a timely response, the court may in its discretion schedule a hearing.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this same date of filing a copy of this motion has been forwarded to every creditor in the master list address that do not have electronic filing records and for those who have the notification has been made by means of the CM/ECF System, including the Chapter 13 Trustee and the U.S. Trustee for the District of Puerto Rico.

In Carolina Puerto Rico on May 14, 2016.

MORENO & MORENO LAW OFFICE  
/s/ROSANA MORENO RODRIGUEZ  
ATTORNEY FOR DEBTOR  
USDC #221903  
P.O. BOX 679  
TRUJILLO ALTO, PR 00977  
PHONE: (787) 750-8160 / 8166 / (787) 287-4116  
FAX: (787) 750-8243  
EMAIL: [rmoreno@morenosolterolaw.com](mailto:rmoreno@morenosolterolaw.com)

Fill in this information to identify your case:

Debtor 1 TOMAS M. DUEÑO ESPADA  
First Name Middle Name Last Name

Debtor 2 MERCEDES E. LUGO RODRIGUEZ  
(Spouse if, filing) First Name Middle Name Last Name

United States Bankruptcy Court for the: DISTRICT OF PUERTO RICO, SAN JUAN DIVISION

Case number 16-00470 ESL  
(if known)

☒ Check if this is an amended filing

Official Form 106G

Schedule G: Executory Contracts and Unexpired Leases

12/15

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, copy the additional page, fill it out, number the entries, and attach it to this page. On the top of any additional pages, write your name and case number (if known).

1. Do you have any executory contracts or unexpired leases?

- ☐ No. Check this box and file this form with the court with your other schedules. You have nothing else to report on this form.
- ☒ Yes. Fill in all of the information below even if the contacts of leases are listed on *Schedule A/B:Property* (Official Form 106 A/B).

2. List separately each person or company with whom you have the contract or lease. Then state what each contract or lease is for (for example, rent, vehicle lease, cell phone). See the instructions for this form in the instruction booklet for more examples of executory contracts and unexpired leases.

Person or company with whom you have the contract or lease Name, Number, Street, City, State and ZIP Code	State what the contract or lease is for
2.1 6 shortterm \$60.00 weekly	6 short term \$60.00 weekly Calle Tapia. \$1,560.00
2.2 DEBORAH SANTIAGO	\$325 Golden Hills
2.3 JOSE MUÑOZ	\$325 - Golden Hills
2.4 MARGARET DUENO	\$325.00 PER MONTH AT CUPIDO 631, VENUS GARDENS.
2.5 SRA. MENDEZ CRUZ	\$325 Golden Hills
2.6 WILDA GARRASTEGUI	\$400 per month contract Golden Hills

**Fill in this information to identify your case:**

Debtor 1	<u>TOMAS M. DUEÑO ESPADA</u>		
	First Name	Middle Name	Last Name
Debtor 2 (Spouse if, filing)	<u>MERCEDES E. LUGO RODRIGUEZ</u>		
	First Name	Middle Name	Last Name
United States Bankruptcy Court for the:	<u>DISTRICT OF PUERTO RICO, SAN JUAN DIVISION</u>		
Case number (if known)	<u>16-00470</u>		

☒ Check if this is an amended filing

Official Form 106Dec

## Declaration About an Individual Debtor's Schedules

12/15

If two married people are filing together, both are equally responsible for supplying correct information.

You must file this form whenever you file bankruptcy schedules or amended schedules. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$250,000, or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

Sign Below

Did you pay or agree to pay someone who is NOT an attorney to help you fill out bankruptcy forms?

☒ No

☐ Yes. Name of person \_\_\_\_\_

Attach Bankruptcy Petition Preparer's Notice, Declaration, and Signature (Official Form 119)

Under penalty of perjury, I declare that I have read the summary and schedules filed with this declaration and that they are true and correct.

X /s/ TOMAS M. DUEÑO ESPADA  
TOMAS M. DUEÑO ESPADA  
Signature of Debtor 1

Date May 14, 2016

X /s/ MERCEDES E. LUGO RODRIGUEZ  
MERCEDES E. LUGO RODRIGUEZ  
Signature of Debtor 2

Date May 14, 2016

ADVANCE COLLECTION SERVICES, INC.  
PO BOX 364607  
SAN JUAN, PR 00936-4607

ATT  
ONE AT&T WAY, ROOM 3A104  
BEDMINSTER, NJ 07921

BANCO POPULAR DE PR  
PO BOX 70100 CARD PRODUCTS DIVISION  
SAN JUAN, PR 00936

BANCO POPULAR DE PR  
MORTGAGE SERVICING DEPARTMENT  
PO BOX 362708  
SAN JUAN, PR 00936-2708

BANCO POPULAR DE PUERTO RICO  
PO BOX 366818 BANKRUPTCY DEPARTMENT  
SAN JUAN, PR 00936-6818

BAUTISTA CAYMAN ASSET COMPANY  
CAPITAL CROSSING PUERTO RICO LLC  
221 AVE. PONCE DE LEON 221 PLAZA  
HATO REY, PR 00918

CICA COLLECTION AGENCY, INC.  
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SAN JUAN, PR 00914-0338

CITIFINANCIAL  
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COLLECTION & MANAGEMENT ASSISTANCE INC.  
239 ARTERIAL HOSTOS AVE SUITE 1102  
CAPITAL CENTER, SOUTH TOWER  
SAN JUAN, PR 00918-1477

CRIM  
PO BOX 195387  
SAN JUAN, PR 00919-5387

DEPARTAMENTO DE HACIENDA  
CAPITOL CENTER TORRE NORTE SUITE 1504  
235 AVE. ARTERIAL HOSTOS  
SAN JUAN, PR 00918-1454

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PO BOX 41243  
DIRECTORIA DE SERVICIOS AL CONDUCTOR  
SAN JUAN, PR 00940-1243

FIRST BANK DE PR  
PO BOX 8318 DEPARTAMENTO DE HIPOTECAS  
SAN JUAN, PR 00910-0318

IRS  
PO BOX 7346  
PHILADELPHIA, PA 19101-7346

LCDO. NICOLAS QUIÑONES CASTRILLO  
PO BOX 195389 ATTORNEY OF DORAL BANK  
SAN JUAN, PR 00919-5389

MIDLAND FUNDING LLC  
BY AMERICAN INFOSOURCE LP AS AGENT  
HOUSTON, TX 77210-4457

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MUNICIPALITY SAN JUAN  
SAN JUAN P.O. BOX 70179  
PR, PR 00936-8179

NW MANAGEMENT GROUP INC  
URB EL CEREZAL CALLE PARANA #1650  
SAN JUAN, PR 00926

POPULAR AUTO  
PO BOX 366818  
SAN JUAN, PR 00936-6818

PR ACQUISITIONS, LLC  
PO BOX 194499  
SAN JUAN, PR 00919-4499

RUSHMORE LOAN MANAGEMENT SERVICES  
PO BOX 11907  
SAN JUAN, PR 00922

TOYOTA CREDIT DE PR  
PO BOX 366251  
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